

INSPECTION REVIEW FORM

NAME OF FACILITY: Franklin ManufacturingID NO. MND 092304856LOCATION: (Address): 701 33rd ave N.St Cloud Minn 56301

OPERATION:

☒ G

• T

☐ TSD

(Circle Appropriate)

INSPECTOR

☒ S

F

J

DATE OF INSPECTION: 1-27-82

NAME OF REVIEWER & DATE:

Paul Dimockrec'd 4-7-824-12-82

COMPLIANCE STATUS

(circle one)

IN

☒ OUT

VIOLATION CLASSIFICATION:

None

I

II

☒ III

STATE ACTION:

letter indicating deficiencies dated 3-30-82

RECOMMENDED ACTION:

NONE

☒ MONITOR STATE

LETTER

ADMINISTRATIVE COMPLAINT

REFERRAL

ASSIGNEE: —DATE ASSIGNED:

cc: Unit Inspection Log



Minnesota Pollution Control Agency

Mr. Kenneth Skahn
Minnesota State Implementation Officer
Hazardous Waste Management Branch 5 WB-TUB
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

March 30, 1982

Dear Ken:

Re: Interim Status Standards Inspection - Franklin Manufacturing
Company MND092304856

Enclosed for your consideration are:

1. RCRA Inspection Report for the above facility.
2. Transmittal letter to Mr. Warren Hull, Vice President
Manufacturing including listing of 40 CFR violations.

As I began my inspection, I met with Mr. Richard Klute, Manufacturing Engineer responsible for Franklin Manufacturing Company (FMC) hazardous waste management. Mr. Klute maintained that FMC should be considered a hazardous waste generator only and not a storage facility. I proceeded to ask him questions pertaining to generators only, in which FMC met most of the requirements. However, as I inspected their hazardous waste storage areas I noticed numerous containers of hazardous waste that indicated that the accumulation dates had gone beyond the ninety (90) day allowable time limit. After completing my inspection, I informed Mr. Klute that FMC will be considered a hazardous waste generator and a storage facility. I also mentioned that FMC was in compliance with 40 CFR Part 122, the reason for this being that they had previously submitted a Part "A" permit application.

At the time of my inspection at FMC, seven (7) violations of 40 CFR Part 265 were cited. The most severe being the lack of an operating record and failure to have a closure plan and closure cost estimates available for inspection. I have given FMC thirty (30) days to respond to the RCRA violations. If the company fails to respond in the given time frame, then the MPCA will seek more formal enforcement action as warranted.

Phone: _____

1935 West County Road B2, Roseville, Minnesota 55113-2785

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Equal Opportunity Employer



Mr. Kenneth Skahn
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If you have any additional comment or questions regarding my inspection, feel free to contact me at 612-297-3359.

Sincerely,


Michael J. Tibbetts
Pollution Control Specialist, Intermediate
Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

MJT:sf

Enclosures



Minnesota Pollution Control Agency

March 30, 1982

Mr. Warren Hull
Vice President, Manufacturing
Franklin Manufacturing Company
701 33rd Avenue North
St. Cloud, Minnesota 56301

Dear Mr. Hull:

Re: Interim Status Standards Inspection - Franklin Manufacturing
Company MND092304856

The Minnesota Pollution Control Agency (MPCA) is cooperating with the U.S. Environmental Protection Agency (EPA), Region V in carrying out the provisions of the Resource Conservation and Recovery Act (RCRA) of 1976, Public Law 94-580. In this effort, personnel of the MPCA are conducting inspections of facilities in Minnesota that are engaged in the generation, transportation, storage, treatment or disposal of hazardous waste materials.

This letter will acknowledge my January 27, 1982 meeting and inspection at Franklin Manufacturing Company (FMC), St. Cloud, Minnesota. As a result of this inspection the MPCA has determined that FMC qualifies as a hazardous waste generator and a storage facility, therefore subject to regulation under 40 Code of Federal Regulation (CFR) Parts 262 through 265 and Parts 122 and 124 and the notification requirements of Section 3010 of RCRA. This determination was made based on the on-site generation and storage for more than ninety (90) day of spent halogenated (F002) and non-halogenated (F005) solvents in quantities that exceed the 1,000 Kilogram (2,200 pound) per calendar month limit.

During the course of my inspection the following violations of 40 CFR Part 265 were cited:

1. Failure to document job titles into the employee's personnel record as specified in 40 CFR Part 265.16(d)(1).
2. Failure to document job descriptions into the employee's personnel record as specified in 40 CFR Part 265.16(d)(2).

Phone _____

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Mr. Warren Hull
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3. Failure to document a written description of training received into the employee's personnel record as specified in 40 CFR Part 265.16(d)(3).
4. Failure to submit copies of the contingency plan to all local authorities as specified in 40 CFR Part 265.53(b).
5. Failure to have an operating record as specified in 40 CFR Part 265.73.
6. Failure to have a written closure plan available for inspection as specified in 40 CFR Part 265.112.
7. Failure to have written closure cost estimates available for inspection as specified in 40 CFR Part 265.142.

I met with Mr. Klute prior to inspecting FMC hazardous waste storage area. He had some questions regarding the transportation of hazardous waste including the types of U.N. numbers to use on hazardous waste manifests. I believe these questions can best be addressed by Mr. Pete Marcotte or Mr. Ray Jones, Minnesota Department of Transportation, Rates and Regulations, 612-296-7115. Both men are knowledgeable of 49 CFR, Hazardous Materials Transportation Regulation, and should be able to assist FMC in any transportation questions they may have.

The MPCA views the cited RCRA violations to be serious in nature and therefore requests the FMC submit a written response addressing these violations to this office within thirty (30) days of receipt of this letter. The written response should include the necessary actions FMC will take to assure compliance with RCRA. A copy of this letter should also be sent to:

Mr. Kenneth Skahn
Minnesota State Implementation Officer
Hazardous Waste Management Branch 5WB-TUB
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

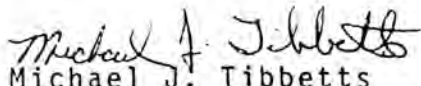
A copy of this letter and the inspection report will be sent to the U.S. EPA, Region V Office in Chicago, Illinois.

Mr. Warren Hull
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Any enforcement action related to this inspection will be initiated by the Minnesota Pollution Control Agency, Solid and Hazardous Waste Division. This letter does not preclude the MPCA from taking other enforcement action as warranted pursuant to any violations of Minnesota Regulations and Statutes.

If you should have any additional comment or questions regarding my inspection, feel free to contact me at 612-297-3359.

Sincerely,



Michael J. Tibbetts
Pollution Control Specialist, Intermediate
Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

MJT:sf

cc: Kenneth Skahn, U.S. EPA, Region V, Chicago, Illinois
Ken Meyer, St. Cloud City Health Department
Ken Hopke, Stearns County Solid Waste Officer

145D012

STATE OF MINNESOTA
HAZARDOUS WASTE DISCLOSURE

MND 092 304 856

12 March 1982
revision forms
with 11 Nov 84 update

A. Generator Information

1. Company Name: White Consolidated Industries Telephone: 1-216-252-3700
Address: 11770 Berea Road
Cleveland, OH 44111
2. Plant Name/Division: Franklin Manufacturing Co Telephone: 1-612-253-1212
Address: 701 North 33rd Avenue
St. Cloud, MN 56301 County: Stearns
3. Responsible Person: Warren Hull Telephone: _____
Address: 701 North 33rd Avenue Business: 1-612-253-1212
St. Cloud, MN 56301 Residence or
Emergency: _____

B. Send completed forms and numbered attachments to:

Minnesota Pollution Control Agency
Hazardous Waste Management Unit
1935 W. County Road B2
Roseville, Minnesota 55113

- C. For each hazardous waste or mixture containing a hazardous waste identified in the Waste Inventory section below, complete and attach a separate Hazardous Waste Management Plan (green form).

STATE IDENTIFICATION NUMBER
(If Applicable)

MND092304856
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Franklin Manufacturing
(B) Street: 701 33rd Ave. N.
(C) City: St. Cloud (D) State: MN. (E) Zip Code: 56301
(F) Phone: 612-253-1212 (G) County: Stearns
(H) Operator: Warren Hull, Vice President Manufacturing
(I) Street: 701 33rd Ave N.
(J) City: St. Cloud (K) State: MN. (L) Zip Code 56301
(M) Phone: 612-253-1212 (N) County: Stearns
(O) Owner: White Consolidated Industries
(P) Street: 11770 Berea Road
(Q) City: Cleveland (R) State: Ohio (S) Zip Code: 44111
(T) Phone: (216)-252-3700 (U) County: Cuyahoga
(V) Date of Inspection: 1-27-82 (W) Time of Inspection (From) 1:30 (To) 3:30
(X) Weather Conditions: Sunny + 25° F

(Y) Person(s) Interviewed	Title	Telephone
<u>Mr. Richard Klute</u>	<u>MFG. Engineer</u>	<u>612-253-1212</u>
_____	_____	_____
_____	_____	_____
(Z) Inspection Participants	Agency/Title	Telephone
<u>Mike Tibbetts</u>	<u>M.P.C.A / PCS, Intr.</u>	<u>612-297-3359</u>
<u>B. Scott Lupin</u>	<u>M.P.C.A / PCS, Intr.</u>	<u>612-297-3364</u>
_____	_____	_____
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Mike Tibbetts</u>	<u>M.P.C.A / PCS, Intr.</u>	<u>612-297-3359</u>
_____	_____	_____

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|--|--|
| <p><u>X</u> <u>A.</u> <u>ON-site</u> <u>OFF SITE DISPOSAL</u>
 <u>Storage and/or Treatment</u>
 ① Containers (I)
 2. Tanks (J)
 3. Surface Impoundments (K)
 4. Waste Piles (L)</p> <p>____ B. Land Treatment (M)</p> <p>____ C. Landfills (N)</p> | <p>____ D. Incineration and/or Thermal Treatment (O and P)</p> <p>____ E. Chemical, Physical, and Biological Treatment (Q)</p> |
|--|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

Generator also

GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

Yes	No	NI*	Remark
-----	----	-----	--------

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source? — X — does not receive hazardous waste from foreign sources
2. Facility expansion? — X — No planned facility expansion

(B) General Waste Analysis:

- | | | | | |
|---|----------|-------|-------|-------|
| 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | <u>X</u> | _____ | _____ | _____ |
| 2. Does the owner or operator have a detailed waste analysis plan on file at the facility? | <u>X</u> | _____ | _____ | _____ |
| 3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | <u>X</u> | _____ | _____ | _____ |

(C) Security - Do security measures include:
(if applicable)

- | | | | | |
|---|----------|---|---|-------|
| 1. 24-Hour surveillance? | <u>X</u> | — | — | _____ |
| 2. Artificial or natural barrier around facility? | <u>X</u> | — | — | _____ |
| 3. Controlled entry? | <u>X</u> | — | — | _____ |
| 4. Danger sign(s) at entrance? | | | | _____ |

(D) Do Owner or Operator Inspections Include:

- | | | | | |
|-------------------------------|----------|---|---|---|
| 1. Records of malfunctions? | <u>X</u> | — | — | — |
| 2. Records of operator error? | <u>X</u> | — | — | — |
| 3. Records of discharges? | <u>X</u> | — | — | — |

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	-----
5. Safety, emergency equipment?	<u>X</u>	---	---	-----
6. Security devices?	<u>X</u>	---	---	-----
7. Operating and structural devices?	<u>X</u>	---	---	-----
8. Inspection log?	<u>X</u>	---	---	-----
(E) Do personnel training records include:				
1. Job titles?	---	<u>X</u>	---	<u>No documented job titles</u>
2. Job descriptions?	---	<u>X</u>	---	<u>No documented job description</u>
3. Description of training?	---	<u>X</u>	---	<u>No documented description of training</u>
4. Records of training?	---	---	---	-----
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	---	---	-----
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>X</u>	---	---	-----
2. No smoking signs?	<u>X</u>	---	---	-----
3. Separation and protection from ignition sources?	<u>X</u>	---	---	<u>ignitable wastes stored in separate area.</u>

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

— X — no evidence of fire, explosion or release of hazardous waste or its constituent.

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

X — —

2. Telephone or 2-way radios at the scene of operations?

X — —

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X — —

Indicate the volume of water and/or foam available for fire control:

Sprinkler system / city water

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X — —

2. Is emergency equipment maintained in operable conditions?

X — —

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

X — —

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement?

X — — —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X — — —

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X — — —

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X — — —

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X — — —

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — — —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	X	—	Contingency plan not given to local emergency organizations.
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X	—	—	_____
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X	—	—	_____
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X	—	—	_____
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	X	—	No emergency situations have occurred

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>—</u>	<u>—</u>	<u>X</u>	<u>OFF site Facility</u>
2. Are records of past shipments retained for 3 years?	<u>—</u>	<u>—</u>	<u>X</u>	<u> </u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<u>—</u>	<u>—</u>	<u>X</u>	<u> </u>

***Not Inspected**

(C) Operating Record

- | | | |
|--|-------|---|
| 1. Does the owner or operator maintain an operating record as required in 265.73? | — X — | <u>no operating record</u> |
| 2. Does the operating record contain the following information: | | |
| **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I? | — X — | <u>does not meet this requirement</u> |
| c. The location and quantity of each hazardous waste within the facility? | — X — | <u>does not meet this requirement</u> |
| ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) | — — X | <u>NA</u> |
| e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? | X — — | _____ |
| f. Reports detailing all incidents that required implementation of the Contingency Plan? | — X — | <u>Contingency plan Not yet implemented</u> |
| g. All closure and post closure costs as applicable? (Effective 5-19-81) | — X — | <u>no closure cost estimate</u> |

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post-Closure				
1. Is the facility post -closure plan available for inspection by May 19, 1981?	<u>—</u>	<u>X</u>	<u>—</u>	<u>NO closure plan</u>
2. Has this plan been submitted to the Regional Administrator?	<u>—</u>	<u>X</u>	<u>—</u>	<u>Not required</u>
3. Has post -closure begun?	<u>—</u>	<u>X</u>	<u>—</u>	<u>Closure has not begun</u>
4. Is the written post -closure cost estimate available by May 19, 1981?	<u>—</u>	<u>X</u>	<u>—</u>	<u>NO closure cost estimates</u>
(B) Post-closure care and use of property				
1. Is the facility post-closure plan available for inspection by May 19, 1981?	<u>—</u>	<u>—</u>	<u>X</u>	<u>N/A</u>
2. Has this plan been submitted to the Regional Administrator?	<u>—</u>	<u>—</u>	<u>X</u>	<u> </u>
3. Has post-closure begun?	<u>—</u>	<u>—</u>	<u>X</u>	<u> </u>
4. Is the written post-closure cost estimate available by May 19, 1981?	<u>—</u>	<u>—</u>	<u>X</u>	<u> </u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Franklin Manufacturing Date of Inspection: 1-27-82

	Yes	No	NI*	Remarks
1. Are containers in good condition:	<u>X</u>	<u>—</u>	<u>—</u>	<u> </u>
2. Are containers compatible with waste in them?	<u>X</u>	<u>—</u>	<u>—</u>	<u> </u>
4. Are containers managed to prevent leaks?	<u>X</u>	<u>—</u>	<u>—</u>	<u> </u>
5. Are containers inspected weekly for leaks and defects?	<u>X</u>	<u>—</u>	<u>—</u>	<u> </u>
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line?	<u>—</u>	<u>—</u>	<u>—</u>	<u> </u>
(Indicate if waste is ignitable or reactive.)	<u>X</u>	<u>—</u>	<u>—</u>	<u>ignitable waste</u>

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	X	NA
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	—	—	X	NA

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	—	—	—	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	—	—	—	_____
3. Do continuous feed systems have a waste-feed cutoff?	—	—	—	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	—	—	—	_____
5. Are required daily and weekly inspections done?	—	—	—	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	—	—	—	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	—	_____

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

- | | | | | |
|--|-------|-------|-------|-------|
| 1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? | _____ | _____ | _____ | _____ |
| 2. Do earthen dikes have protective covers? | _____ | _____ | _____ | _____ |
| 3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? | _____ | _____ | _____ | _____ |
| 4. Is the freeboard level inspected at least daily? | _____ | _____ | _____ | _____ |
| 5. Are the dikes inspected weekly for evidence of leaks or deterioration? | _____ | _____ | _____ | _____ |
| 6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | _____ | _____ | _____ | _____ |
| 7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) | _____ | _____ | _____ | _____ |

L
WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

*Not Inspected

M

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	_____
**2. Collection of run-off from active portions of the fill?	---	---	---	_____
**3. Is collected run off treated?	---	---	---	_____
4. Control of wind dispersal of hazardous waste?	---	---	---	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	_____
2. The contents of each cell and the location of each hazardous waste type within each cell?	---	---	---	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	_____
2. Has this plan been submitted to the Regional Administrator?	---	---	---	_____
3. Has closure begun?	---	---	---	_____
4. Is closure cost estimate available by 5-19-81?	---	---	---	_____
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

3. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Are combustion/emission control instruments monitored at least every 15 minutes?

B. Is steady state maintained or corrections attempted?

C. Is stack plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?**

E. If yes to D above, were corrections made to return emissions to normal appearance?**

F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Are emergency shutdown controls and system alarms checked daily for proper operation?

*Not Inspected

**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	—	—	—	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	—	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	—	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<u>X</u>	—	—	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	—	—	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>X</u>	—	—	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	_____
7. Required certification?	<u>X</u>	—	—	_____
8. Required signatures?	<u>X</u>	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	<u>X</u>	—	—	<u>owner is aware of this requirement</u>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	—	—	_____
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	—	—	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	<u> </u>	<u> </u>	<u>X</u>	<u>NA</u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line)?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c. Do continuous feed systems have a waste-feed cutoff?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
d. Are required daily and weekly inspections done?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	—	—	<u>X</u>	<u>NA</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	—	—	<u>X</u>	

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?	—	—	<u>X</u>	

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	—	—	<u>X</u>	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	<u>X</u>	
c. Met the Manifest requirements?	—	—	<u>X</u>	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	—	—	<u>X</u>	

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	<u>X</u>	—	—	—

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	—	<u>X</u>	—	<u>NA - NO international shipments</u>
B. Are signed completed manifest(s) on file?	—	—	—	—

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	—	<u>X</u>	—	—
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	—	<u>X</u>	—	—

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

3121 Nicollet Avenue □ Minneapolis, Mn. 55408 □ Phone: (612) 824-2675

July 6, 1981

Mr. Richard Clute
Franklin Manufacturing Co.
701 33rd Ave. N.
St. Cloud, MN 56301

Dear Mr. Clute:

Enclosed is a copy of our report of laboratory analysis for samples received at PACE Laboratories, Inc. on May 29, 1981. The 3 samples received were identified as:

1. Paint Sludge
2. Paint Ash from the Blue Surf Operation
3. Paint Ash from Midway Iron

The purpose for this analyses was to determine the impact of a paint formulation change on the method of disposal for these waste types. It is our understanding that the formulations for the paints used at Franklin Manufacturing were modified to minimize the presence of lead and chromium pigment. Your material Safety Data Sheets for all paint colors used at Franklin Manufacturing are attached to this report. ?

The data presented in Tables I and II demonstrate that each of these three wastes would be classified as non hazardous under both the state of Minnesota and the Federal Environmental Protection Agency hazardous waste rules. The analyses in Table I were performed directly on the waste as received at PACE Laboratories, Inc. A comparison of this analyses with the MPCA hazardous waste criteria relative to corrositivity, flammability, toxicity and List 1 show all three wastes to be non hazardous. Experience and common knowledge indicate that none of these wastes are explosive, oxidative or irritative. Table II shows that all 3 wastes fall below the EPA EP Toxicity criteria and the MPCA List 2 criteria for defining a waste as hazardous.

Table II also demonstrates that each of the three waste types meets the MPCA 10-10 criteria for codisposal of non hazardous industrial waste in a sanitary landfill. Assuming that all wastes are free of standing water, we would recommend that the MPCA be approached for approval of disposal of these 3 waste types in a sanitary landfill. To accomplish this Mr. Bruce Brott at the MPCA (297-3771) should be contacted to obtain a "Request for Codisposal of a Non Hazardous Industrial Waste" form. The analytical data in this report can be used to assist in the completion of this form. However, you will also have to obtain the signature of a landfill operator who would be willing to dispose of the 3 wastes in the sanitary landfill pending approval of the MPCA. This form along with a copy of our laboratory report should then be submitted to Mr. Brott for review and approval.

PACE Laboratories, Inc.

July 6, 1981

Mr. Richard Clute

Franklin Manufacturing Co.

If you have any further questions with respect to this report, please feel free to contact me at any time.

Yours truly.

A handwritten signature in cursive script, reading "William A. O'Connor". The signature is fluid and extends to the right with a long, sweeping tail.

William A. O'Connor, CPC
Vice President

WAO/1fs

TABLE I
DIRECT ANALYSIS OF WASTE FOR
FRANKLIN MANUFACTURING CO.

<u>Parameter</u>	<u>MPCA HW Criteria</u>	<u>Paint Sludge</u>	<u>Blue Surf Ash</u>	<u>Midway Ash</u>
pH	3-12	6.8	8.0	10.6
Cadmium, ppm	500	4.9	0.32	0.76
Chromium, ppm	1,000	2.7	72	3.3
Lead, ppm	600	26	< 2	69
Mercury, ppm	-	0.19	0.05	< 0.10
Nickel, ppm	10,000	24	20	21
Arsenic, ppm	500	0.14	< 0.13	0.25
Selenium, ppm	-	< 0.11	< 0.13	< 0.13
Beryllium, ppm	20	4.0	< 0.3	< 0.4
Flash Point, °F	200	> 200	-	-
Solvents, % ⁽¹⁾	-	< 0.1	-	-

(1) 6.5 gram of sample was extracted with carbon disulfide. The extract was injected onto a 10% SP2100, 100/120 suplecoport column with FID detector. No organic solvents were detected.

TABLE II

EP TOXIC LEACHATE ANALYSIS FOR
FRANKLIN MANUFACTURING CO.

(1)

Parameter	EPA EP Toxic	MPCA 10:10 Criteria	MPCA List 2	EP TOXIC LEACHATES		
				Paint Sludge	Blue Surf Ash	Midway Ash
Silver, mg/l	5.0	0.5	-	< 0.04	< 0.04	< 0.04
Barium, mg/l	100.0	10.0	-	< 0.3	< 0.3	< 0.3
Cadmium, mg/l	1.0	0.1	1.0	< 0.01	< 0.01	0.03
Chromium, mg/l	5.0	0.5	5.0	< 0.05	< 0.05	< 0.05
Lead, mg/l	5.0	0.3	3.0	< 0.1	< 0.1	0.1
Mercury, mg/l	0.2	0.002	0.2	< 0.0002	< 0.0002	< 0.0002
Arsenic, mg/l	5.0	0.1	5	< 0.001	< 0.001	0.012
Selenium, mg/l	1.0	0.01	-	< 0.001	< 0.001	< 0.001

Nickel ?

0.1

- (1) The EPA EP Toxicity leachate test was performed on these samples prior to analysis.

CO-DISPOSAL REQUESTS

Reviewer: BWB

Name of Requestee: Franklin Mfg. Date Rec'd: 4/17/81

Type of Waste: Paint Sludge Ash

Quantity of Waste: Blue Surf 10 drums Midway Iron 300-36 gal

Frequency of Disposal: One time

Place of Disposal (Name of SLF): not specified

Permit No. of SLF: SW ? Location: _____

SLF permit disposal of this type of waste? (YES) (NO)

Review by H. W. Management Unit; waste is (hazardous) (non-hazardous) 5/6/81
Midway Iron Blue Surf

Review of request by Ground Water Section? (YES) (NO)

If yes, request sent to Ground Waters (date): 5/26/81

Comments rec'd on (date) 6/2/81 Any concerns? Summarize:
size of drums EP for lead 1.3 10/10 0.3 want H₂O leach
6/11/81 Mike Sommer Memo send list of landfills sent to Bill Quinn
6/10/81

Review of request by Enforcement Section, sent (date): 5/26/81

Comments rec'd on (date) 5/28/81 Any concerns? Summarize:*
want facility specified

Contacted County SW Officer on (date) _____ Any concerns? Summarize:*

Contacted MPCA Regional Office on (date) _____ Any concerns? Summarize:*

Public Notice of Request necessary? (YES) (NO)

If no, on what basis? See 6/10/82 Request

Date of Public Notice in local publication: (date) _____

(publication) _____

Any comments rec'd (YES) (NO) If yes, summarize (use back for more space):

Letter of Approval/Denial drafted (date): _____

Letter of Approval/Denial sent for TH's signature (date): _____

Date of Approval/Denial: _____

Mike Tibbets

APR 06 1981

Mr. Richard Clute
Franklin Manufacturing Company
701 North 33rd Avenue
St. Cloud, Minnesota 56301

MES 4-2-81

Dear Mr. Clute:

Thank you for meeting with Ken Meyer (St. Cloud City Health Department) and me on March 12, 1981 to explain and demonstrate Franklin Manufacturing Company operations. As was indicated in our meeting, the Minnesota Pollution Control Agency (MPCA) will await PACE Laboratories' evaluation of Franklin's paint ash. Upon receipt, hopefully a decision can be made regarding the best waste management practices for Franklin's wastes. Depending on the information supplied to the Agency, further testing of the paint sludge may be required prior to making our decision regarding landfilling of the wastes. If landfilling looks to be a possible method of disposal, the moisture free content of the paint sludge would also have to be guaranteed before Franklin could receive MPCA permission to send these industrial wastes to a sanitary landfill. Franklin Manufacturing Company would need Agency permission to co-dispose of the following wastes:

1. Dried paint residue (if determined to be nonhazardous).
2. Vinyl stripper.
3. Paint filters.
4. Excess plastic waste.
5. Urethane foams.

Questions concerning this co-disposal of nonhazardous wastes procedure should be directed to James Warner, Engineering Review Unit, at 612/297-2722.

Although the following items were discussed, a letter from Franklin addressing each concern is requested for our files:

1. Disclosure Item 7: The estimated amount of waste oil produced, the anticipated shipping frequency and quantities of each shipment, the transporter name(s) and the name of the disposal/recovery facility is needed for approval of this management plan.
2. When calculating the quantities of wastes stored every three months according to the management plans submitted by Franklin, a capacity of more than 11,000 gallons is determined. A facility with a capacity of greater than 5,000 gallons (18,927 liters) is required to obtain a storage permit pursuant to 6 MCAR § 4.9004 I. Please describe Franklin's storage procedures. As we discussed in our meeting, the amounts of wastes produced and their shipping frequencies listed on the management plans must correspond to the actual practices. This is the only way the MPCA knows if permits are required. Please indicate the quantities of wastes produced and anticipated shipping frequencies consistent with actual practices.

We would appreciate a response to the above items within 30 days so that our disclosure review can be completed. The Agency will contact you once the paint test results are received. Your cooperation in this matter is appreciated.

Sincerely,

Michael E. Sommer
Pollution Control Specialist
Hazardous Waste Management Unit
Solid and Hazardous Waste Division

MES:cd

cc: Ken Meyer, City Hall, 314 St. Germain Street,
St. Cloud, Minnesota 56301

bcc: JLW
Mike Tibbets ✓

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413

MINNESOTA POLLUTION CONTROL AGENCY

Route to:

- (1) _____
(2) _____
(3) _____
(4) _____

OFFICE MEMORANDUM

FILE Franklin Mfg. Co.

Location St. Cloud, MN.
(city, village, township, section, range, county, etc.)

Subject Disposal Review / Inspection

By Whom Mike Sommer Date 3/12/81

Investigation ☒ Conference ☐ Office ☐
Field ☐ Hearing ☐ Meeting ☐

Phone _____

Items to be Covered: (1) Those present and/or those interviewed
(2) Situation
(3) Further action, follow-up, recommendation

(1) Ken Meyer, St. Cloud City Health Dept. 612/251-5541

Richard Hill, White Consolidated Ind.

Dick Clute, Franklin Mfg.

Bill O'Connor, PACE Laboratories

(2) Explanation of processes:

a) Blue surf paint (brand name) removal - Incineration process
removing paint residues on the paint hooks, screens &
filters which went through the waterfall spray booth.
Air blows the residues off into the incinerator. The
resultant waste is an ash.

b) ABS & Polystyrene - Franklin makes plastic door liners, lid
liners & breaker strips. Most plastic "wastes" are re-melted
and then re-used. Only the contaminated plastic - that
MPCA-SWD-2 which comes in contact with foam - is disposed

of as waste.

- c) Maintenance - Wastes resulting from plant wide clean ups.
- d) Urethane forming - Wastes from cleaning the urethane forming equipment. Franklin is in the process of changing to high pressure air machines to clean the nozzles. High pressure air will remove the foam. Franklin plans to reduce their usage of the methylene chloride.
- e) Bondrite - A step done prior to painting the steel. The steel has a protective coating which needs to be removed before the paint will adhere to the steel. This process removes that coating.

Discharge Questions:

1. Franklin began changing their paint line in Nov. 1980 - change over completed by Dec. 15, 1980. They are now using a more expensive paint containing non-metallic pigments. They have not run any tests on the new paint as such, but have tested the ash from their incineration process. The report by PACF will be forthcoming to the Agency. When asked for Material Data Sheet on the new paint, Franklin said they would wait till the PACF report is submitted to PCA. Franklin feels they will be able to re-classify the ash (and paint) and handle all as nonhazardous. Currently the ash waste is being stockpiled.

Franklin feels that the Pb in Midway Iron's ash does not all ~~come~~ from Franklin's process. They feel Midway adds enough Pb from their own processes.

- 3.4. A vinyl stripper is coated on the inside of the electrostatic paint booth to prevent paint from sticking to the booth. This hardened stripper with paint on it & the paint filters all from the spraying operations are disposed with the paint residue. Again, disposal depends on results of new paint.

6. Franklin does not know the quantities of plastic wastes sent to St. Augusta SLF.

7. Franklin will provide MPCA with name of oil disposal facility at the meeting mentioned:

Transporter: Berts Drain Oil Service
Reclaimer: Warden's Oil

Miscellaneous Questions:

1. Storage - PACE has filled out management plans indicating shipping frequencies under the federal 90 day limit. Franklin stated they ship quite frequently - do not store 5000 gallons. Will need this statement in a letter from Franklin.
2. Incinerator - Franklin is currently developing a Waste Management Plan for the company - investigating various options for their waste disposal. They are still considering incineration. The Sheffield permit enclosed in the disclosure file is simply an option Franklin has left open for themselves. They are not sending paint (or other wastes) to Sheffield now. may in the future.

(3) Further action, follow ups:

1. Await paint results from PACE
Review / Decide if can landfill. Co-disposal procedure → unknown
2. Oil disposal facility?
3. Storage requirements?
4. Resubmitted of disclosure - amounts produced / shipped correspond?
5. Refer Bondable process to WQ, Pretreatment.